

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

NATASHA MUHAMMAD,

Plaintiff,

vs.

COUNTY OF SUMMIT, *et al.*,

Defendants.

CASE NO.: 5:20-cv-01408

JUDGE: HON. JOHN R. ADAMS

**REPORT OF PARTIES'
PLANNING MEETING UNDER
FED. R. CIV. P. 26(f) AND L.R.
16.3(b)**

1. Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.3(b), a meeting was held on September 30, 2020, and was attended by:

Rebecca J. Sremack	Counsel for Plaintiff(s):	Natasha Muhammad
Billi Copeland King	Counsel for Plaintiff(s):	Natasha Muhammad
John D. Pinzone	Counsel for Defendant(s):	County of Summit, Sheriff Steve Barry, Deputy Christopher R. Boyd, and John/Jane Doe Nos. 1-5

2. The parties:

- ☐ have not been required to make initial disclosures.
- ☒ have exchanged the pre-discovery disclosures required by Fed. R. Civ. P 26(a)(1) and the Court's prior order;

3. The parties recommend the following track:

- ☐ Expedited ☒ Standard ☐ Complex
- ☐ Administrative ☐ Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution (“ADR”) mechanisms:

- ☐ Early Neutral Evaluation
- ☐ Mediation
- ☐ Arbitration.
- ☐ Summary Jury Trial
- ☐ Summary Bench
- ☒ Case not suitable for ADR at this time.

5. The parties ☐ do/ ☒ do not consent to the jurisdiction of a United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. Recommended Discovery Plan:

- (a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

Interrogatories, Requests for Production of Documents and depositions (approximately 3) concerning liability and defenses as well as damages. The parties will stipulate that discovery completed in the previous filing of this matter, 5:18-CV-2010, will carry over to the refiling, but that this does not limit any parties’ right to object to prior discovery or conduct discovery under the present case number.

- (b) Discovery cut-off date: 2/15/2021

7. Recommended dispositive motion date: 3/15/2021

8. Recommended cut-off for amending the pleadings and/or adding additional parties: 10/12/2020

9. Recommended date for a Status Hearing: 1/15/2021

10. Other matters for the attention of the Court: N/A.

/s/ Rebecca J. Sremack
REBECCA J. SREMACK (0092313)
Sremack Law Firm, LLC

/s/John D. Pinzone
JAMES A. CLIMER (0001532)
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*Counsel for Defendants County of Summit,
Sheriff Steve Barry, Deputy Christopher R.
Boyd, and John/ Jane Doe Nos. 1-5*

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2020, a copy of the foregoing Report of Parties Planning Meeting Under Fed. R. Civ. P. 26(f) and Local Rule 16.3(b) was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Rebecca J. Sremack

REBECCA J. SREMACK (0092313)

Counsel for Plaintiff